



**Livestock and Seed Program
Audit, Review, and Compliance Branch
Quality System Audit Report**

AUDIT INFORMATION

Applicant Name:	NOFA-NY Certified Organic, LLC
Est. Number:	N/A
Physical Address:	840 Upper Front Street, Binghamton, NY 13005
Mailing Address:	Same
Contact & Title:	Carol King, Co-Administrator Lisa Engelbert, Co-Administrator
E-mail Address:	certifiedorganic@nofany.org
Phone Number:	607-724-9851
Auditor(s):	Martin Friesenhahn
Program:	USDA National Organic Program (NOP)
Audit Date(s):	October 1, 2007
Audit Identifier:	NP7039BBB
Action Required:	No
Audit Type:	Corrective Action Audit
Audit Objective:	To verify that corrective actions adequately address the non-compliances from the Surveillance-Accreditation Renewal Audit.
Audit Criteria:	<ul style="list-style-type: none">7 CFR Part 205 National Organic Program, Final Rule, dated December 21, 2000; Updated September 11, 2006
Audit Scope:	The company's submitted corrective actions.
Location(s) Audited:	Desk

NOFA-NY Certified Organic, LLC submitted corrective actions dated September 11, 2007 addressing the non-compliances from the accreditation renewal audit conducted June 12-14, 2007. The corrective actions were requested August 17, 2007 by the NOP and received by the auditor on September 27, 2007 (received September 17, 2007 by the NOP). The submitted corrective actions to the NOP actually addressed the non-conformances from the ISO Guide 65 Audit. However, the corrective actions were reviewed for the non-compliances to the NOP Audit since the submitted corrective actions were pertinent to the NOP non-compliances.

FINDINGS

The corrective actions submitted by NOFA-NY Certified Organic, LLC adequately addressed the non-compliances from the accreditation renewal audit.



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NP7039BBB.NC1 – Adequately Addressed - NOP § 205.403 (c)(1-3) On-site inspection – Verification of information states, “The on-site inspection of an operation must verify: (1) The operation’s compliance or capability to comply with the Act and the regulations in this part; (2) That the information, including the organic production or handling system plan... accurately reflects the practices used or to be used by the applicant for certification or by the certified operation; and (3) That prohibited substances have not been and are not being applied to the operation....” *During the observation of the livestock and crop inspection it was determined that the inspector did not adequately review two areas of the strawberry production. The field records were not reviewed to determine the application dates of the compost and manure on the strawberry fields. In addition, the records were not reviewed to determine the organic status or source of the strawberry plants planting stock.* **Corrective Action:** A memo was sent to all inspectors reminding them of the importance during farm inspections of inspecting and verifying records related to compost and manure use and application and the rules for transplants and seeds. In addition, the Dairy/Livestock Inspection Report was revised to reflect questions regarding compost/manure use and sourcing of planting stock. The Crop/On-Farm Processing/Handling Inspection Report was also submitted which contained questions on compost and manure usage and the use and source of transplants.

NP7039BBB.NC2 – Adequately Addressed - NOP §205.662(a)(1-3) requires the certifying agent to include: (1) the description of each non-compliance; (2) the facts upon which the notification of non-compliance is based; (3) the date by which the certifying operation must rebut or correct each non-compliance and submit supporting documentation of each such correction when correction is possible; and (b) requires the certifying agent to send the certified operation a written notification of non-compliance resolution when the certified operation demonstrates that each non-compliance has been resolved. *NOFA-NY Certified Organic, LLC has procedures in place for when non-compliances are issued. The Determination Letters to some of the certified operations included a category for Committee Comments/Recommendations listing some deficient areas and a timeframe for these to be submitted in writing to NOFA-NY Certified Organic, LLC. Some of these issues listed were determined during the audit to be minor non-compliances to the NOP Rule which would then have required the written notifications of non-compliance and written notices of resolution. However, the issues listed on this letter for the certified operation to address were not always clearly identified and the timeframes for submitting corrective actions were not always listed. In addition, the written notifications of non-compliance resolutions were not submitted to the certified operations since NOFA-NY Certified Organic, LLC did not consider these issues as minor non-compliances.* **Corrective Action:** The Administrative Procedures Manual was revised (August 2007) and now describes the process for notification of non-compliances with specific timeframes for the client to address and that a Resolution Notice will be sent to the clients once the non-compliances are resolved. The submitted corrective actions also included an example of the Resolution Notice Letter.